

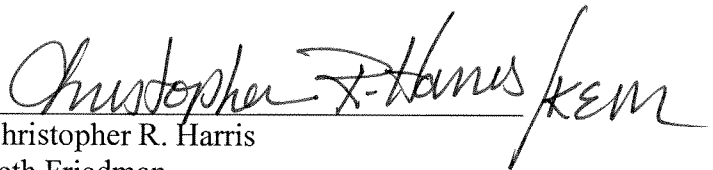
Pursuant to Local Rule 26.1(f), Plaintiffs hereby certify that the parties conferred about this motion and Defendant does not oppose.

CONCLUSION

For the reasons set forth above, the Court should grant Plaintiffs unopposed motion to file documents under seal.

Dated: September 15, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher R. Harris", is written over a horizontal line.

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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION, et al.,

Plaintiffs,

Y.

ALBERTO R. GONZALES, in his official capacity as
ATTORNEY GENERAL OF THE UNITED STATES.

Defendant.

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Civ. Act. No. 98-CV-5591
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[PROPOSED] ORDER

Before the Court is Plaintiffs' Unopposed Motion to Seal Document Plaintiffs' Opposition to Defendant's Motion *In Limine* To Exclude Certain Proposed Testimony of Michael A. Russo and Proposed Testimony of Henry Reichman, as well as Exhibit 6 to the Declaration of Christopher R. Harris to Plaintiffs' Memorandum in Opposition to Defendant's Motion To Dismiss And, In The Alternative, For Partial Summary Judgment, filed by Plaintiff American Civil Liberties Union. After consideration of all papers and pleadings submitted to the Court and for good cause shown, IT IS HEREBY ORDERED that:

1. The motion is GRANTED.
2. Plaintiffs' Opposition to Defendant's Motion *In Limine* To Exclude Certain Proposed Testimony of Michael A. Russo and Proposed Testimony of Henry Reichman shall be FILED UNDER SEAL.
3. Exhibit 6 to the Declaration of Christopher R. Harris to Plaintiffs' Memorandum in Opposition to Defendant's Motion To Dismiss And, In The Alternative, For Partial Summary Judgment shall be FILED UNDER SEAL.

IT IS SO ORDERED.

Dated: _____, 2006

HON. LOWELL A. REED, JR.
UNITED STATES DISTRICT JUDGE